

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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| In the Matter of |) | |
| |) | |
| Numbering Resource Optimization |) | CC Docket No. 99-200 |
| |) | |
| Implementation of the Local Competition |) | CC Docket No. 96-98 |
| Provisions of the Telecommunications |) | |
| Act of 1996 |) | |

COMMENTS OF WORLDCOM, INC.

Pursuant to Public Notice DA 02-108 (rel. January 15, 2002), WorldCom, Inc. (WorldCom) hereby submits comments on the Numbering Audit Program developed by the Common Carrier Bureau for random audits to be performed on telecommunications carriers that use numbering resources.

WorldCom notes at the outset that the Bureau has proposed an audit process that appears to be more detailed than any numbering audit that WorldCom has previously experienced. This level of detail may be necessary for a complete evaluation of carrier compliance with the Commission's extensive numbering rules. In truth, only time and experience can show whether this proposed audit program is a cost-effective way to assess carrier compliance with numbering rules. WorldCom recommends that the Bureau treat the audit program as a work-in-progress, and subject it to periodic reappraisal in light of the knowledge that will be gained from actual experience.

While extremely detailed in the information it would seek from carriers, the Bureau's proposed audit program is itself lacking in sufficient detail to allow a thorough

evaluation of its likely efficacy with respect to several issues. WorldCom believes that the industry would benefit from the release of clarifying information on the following:

- Several lines in the audit program would require the auditor to “take a sample” of various data points from carrier systems and inventories. No description is provided, however, of the sampling methodology or of the confidence interval that would be used in assessing whether to reject the hypothesis that the carrier has complied with applicable rules. WorldCom strongly recommends that the Bureau provide additional guidance and establish specific parameters on these matters in advance of performing an actual audit. This approach will benefit all parties and minimize *ex post* disputes on the fairness of the audit process or its conclusions.
- The proposed audit program does not indicate the backward-looking time frame that will be subject to audit. WorldCom recommends that any audit look back no more than 12 months to avoid drawing incorrect inferences of current non-compliance based on stale data. The Bureau should explicitly limit the audit program to a 12-month data interval.
- Line 18 of the proposed audit program would seek a sample of “ported” numbers. The Bureau should clarify that this applies only to “ported-out” numbers, since there is likely to be little useful information to be gleaned from “ported-in” numbers.
- Lines 58 and 59 of the proposed audit program appear to address reclamation of numbers by carriers. The referent of these lines is entirely unclear. Carriers do not commonly reclaim numbers. These lines may be referring to

the process by which numbers are aged and then “reclaimed” for available status. Alternatively, they may be referring to the process by which numbering resources are reclaimed from carriers. The Bureau should clarify the intent of these lines so that carriers can prepare adequately to participate in a random audit.

WorldCom supports the prudent use of random audits to ensure compliance with numbering rules. The success of those audits depends greatly on the ability of carriers to respond in a timely fashion to all information requests made by the auditor. Carriers will be able to do so if the process is rational and transparent. Accordingly, WorldCom requests that the Bureau clarify the proposed audit program in accordance with these comments.

Respectfully submitted,

WorldCom, Inc.

/s/

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February 15, 2002